

# Clarion's Supplier Code of Conduct



## Our Standards

### 1 Acting in the best interests of Clarion and its Residents

#### 1.1 Meeting Your Responsibilities

We expect our suppliers and their staff to fulfil their duties and obligations responsibly, acting at all times in good faith and in the best interests of Clarion and its residents.

- Suppliers must always seek to reflect [Clarion's values](#).
- Suppliers must not act in a way that discriminates against, or unjustifiably favours, particular individuals, groups or interests, including based on any protected characteristics<sup>1</sup> they may have.
- Suppliers must consider the impact of their actions and ensure they do not negatively affect the safety and wellbeing of residents.

#### 1.2 Representing Clarion

Where representing Clarion in any capacity, including at external events, in dealings with outside bodies and on social media, suppliers should ensure they are an ambassador for Clarion and must uphold and promote its values, objectives and policies.

Suppliers must not make derogatory, false or otherwise damaging comments, in person or through any medium, about Clarion or any person, service or organisation connected with it.

Suppliers must not seek to officially represent the views or position of Clarion without prior authority.

Suppliers should make clear in what capacity they are communicating where any personal social media accounts refer to their role with Clarion. Suppliers must obtain prior consent if they intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Clarion. Such consent will not be unreasonably withheld unless their activity poses a material risk to Clarion.

Suppliers must not conduct themselves in a manner that could reasonably be regarded as bringing Clarion into disrepute.

#### 1.3 Working with Residents and Other Customers

Suppliers must be professional, fair and courteous in all their dealings with residents and other customers.

- Suppliers must seek and value views from residents and other customers when making decisions that will affect them.
- Suppliers must not allow any personal relationship with a resident or other customer to influence how they discharge their roles and responsibilities.
- Suppliers must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, Clarion employees, residents or other customers.
- Suppliers must not engage in any private work for residents unless explicit, written approval has been sought and granted by Clarion.
- Suppliers must ensure that their staff carry identification at all times and make it readily available for residents and Clarion staff.

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<sup>1</sup> as defined by the Equality Act 2010

## **1.4 Professional Relationships**

Suppliers must maintain constructive, professional relationships with Clarion staff and involved residents, based on a sound understanding of their respective roles.

Suppliers must not ask for, or encourage, the commitment of wrongdoing, including any breach of this Code.

## **2 Behaving with Integrity**

The reputation of Clarion depends on compliance with this Code, and with the laws, policies and procedures it refers to. The integrity of suppliers involved with Clarion needs to be beyond doubt and seen to be so.

### **2.1 Conflicts of Interest**

Suppliers must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between their duties to Clarion and their personal interests, other duties and contractual relationships.

Suppliers must formally declare to Clarion, at the earliest opportunity, any interests which may, or may be perceived in the future, to conflict with the duties of their role. Suppliers should not use, or attempt to use, their position to promote personal interests or those of any connected person, business or other organisation for personal gain.

### **2.2 Gifts, Hospitality and Bribery**

Suppliers in their role with Clarion, must not offer, seek or accept bribes or inducements to act improperly or corruptly. Suppliers must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise their judgement or integrity or place them under an obligation to those individuals or organisations.

### **2.3 Funds, Resources and Personal Benefits**

Suppliers must ensure that Clarion's funds and resources are used properly and efficiently.

Suppliers must take all reasonable measures to protect Clarion's funds, resources, property and assets from fraud, theft, damage and misuse.

### **2.4 Confidentiality**

- Suppliers must not disclose, without the required permission and authority, any personal data about residents, customers, staff or colleagues.
- Suppliers must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after suppliers have left Clarion and stepped down from their position.
- Suppliers must not without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to Clarion - unless doing so by Clarion's Whistleblowing Policy.

Suppliers must not prevent another person from gaining access to information to which they are entitled by law.

## **3 Conducting yourself professionally and treating others well**

Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity and inclusion, are fundamental to the delivery of Clarion's social purpose.

### **3.1 Respect for Others**

We require our suppliers to treat all others with respect and consideration.

- Suppliers must treat everyone they meet in the performance of their role with equal respect, care and consideration.
- Suppliers must show respect for individuals' chosen identities.
- Suppliers must not harass, bully or attempt to intimidate any person or use threatening or aggressive behaviour or other discriminatory behaviours. Suppliers must seek to avoid microaggressions in their speech and behaviour.

### **3.2 Performance Management**

Suppliers must play an active part in Clarion's supervision and contract performance processes.

## **4 Protecting yourself, other People and the Environment**

Suppliers have a responsibility while on Clarion business to protect their health, safety, security, wellbeing, and that of others, and to eliminate harmful environmental impacts.

### **4.1 Health and Safety**

Suppliers' conduct, actions and decision-making must promote the health, safety, security and wellbeing of all staff and others.

Suppliers must not knowingly put their own or others' health, safety, security or wellbeing unnecessarily at risk.

### **4.2 Safeguarding**

We expect suppliers to have completed Clarion's safeguarding training as part of supplier on-boarding.

We expect suppliers to raise concerns if they identify children and adults suffering from, or likely to suffer from significant harm.

All suppliers and their staff must:

- Take action to make sure the person is safe.
- If the child or adult is at immediate risk, contact 999.

### **4.3 Protecting and Enhancing the Environment**

Clarion aspires to be a force for good for both people and the planet. We aim to deliver quality, net zero carbon homes that improve access to nature and are built for the future.

In carrying out actions or making decisions in the performance of their role, suppliers must therefore consider the environmental impact of their work and ensure at all times that they are operating in a way which meets Clarion's sustainability objectives, targets and policies. See our [Sustainable Development Roadmap](#) for further information.

Suppliers must comply with all relevant environmental legislation and must avoid negative impacts in order to deliver positive environmental outcomes.

## 5 Data Protection

Suppliers must process information in accordance with the General Data Protection Regulation (GDPR) and Clarion's Data Protection Policy.

## 6 Information Security

All suppliers must adhere to Clarion's Information Security Policy. This sets out how our delivery partners/suppliers will manage and protect our information. Clarion is committed to ensuring effective security arrangements are implemented and regularly reviewed to reduce threats, manage risks and to protect:

- The information that Clarion collects, creates, uses and stores.
- Employees, residents and customers.
- Physical assets and resources.
- Digital, IT and communication systems.

## 7 Contact Us

Suppliers must not victimise or disadvantage any person who uses or intends to use Clarion's confidential reporting (Speak up Policy / Whistleblowing) to report actual or alleged wrongdoing.

### Suppliers must report:

- Any concerns about possible wrongdoing. This includes becoming aware of potentially dishonest or fraudulent activity, material breaches of this Code or relevant legislation (including health and safety or environmental), or being required to act in a way that conflicts with this Code or legislation.
- Any queries, concerns, or if you wish to escalate a situation that they are uncomfortable with ("whistleblowing").
- Any concerns about the health, safety, security or wellbeing of themselves, other individual or a group of individuals connected with Clarion. For safeguarding concerns immediately contact the Contract Manager within Property Services and the Safeguarding team at [safeguarding@clarionhg.com](mailto:safeguarding@clarionhg.com).
- Suppliers must declare any 'Known Relationship' to a resident or Clarion employee involved in decisions relating to their relationship with Clarion.
- Any gifts or hospitality offered to a supplier or by a supplier must be either declared or declined.
- Any known environmental incidents associated with their work.

### CONTACT US:

**Head of Governance**

**Email: [speakup@clarionhg.com](mailto:speakup@clarionhg.com)**

## Glossary

Term	Definition
<b>Suppliers/contractors</b>	Includes those other than board members, staff and involved residents who are directly involved in delivering the Clarion's business activities. This includes contractors, sub-contractors, consultants, agents and others.
<b>Staff members and staff</b>	Includes Clarion's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation.
<b>Residents and other customers</b>	Includes residents, tenants, leaseholders, shared owners and users of other services provided by Clarion.
<b>People with whom you are 'closely connected'</b>	In broad terms, this means your family, relatives or business partners as well as people connected with businesses in which you have an interest through ownership or influence. The term includes your spouse or unmarried partner or civil partner, children, siblings, grandchildren, grandparents and any other family members.
<b>Microaggression</b>	Is a term used for brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.
<b>Known Relationship</b>	For this Code means related parties and close connections, it is not envisaged that relationships with acquaintances should be covered by this term.
<b>Clarion Housing Group</b>	<p>Clarion Housing Group Limited is a charitable Registered Society (Registration Number 28038R). Clarion Housing Group Limited is regulated by the Regulator of Social Housing (RSH) (Registration Number LH4087).</p> <p>The Registered Office is: Level 6, 6 More London Place, Tooley Street, London SE1 2DA</p> <p>This code applies to all the <a href="#">entities associated with Clarion</a>. All companies registered at Companies House are registered in England and Wales.</p>
<b>Clarion's Values</b>	Values <a href="#">link</a>

## Related Policies

This Code sets out Clarion's expectations in line with its policies, particularly as set out in the following:

- Data Protection Policy
- Speak Up Policy / Whistleblowing
- Group Sustainability Policy
- Group Sustainability Strategy
- Information Security Policy.

See [Section 7 Contact Us](#) on how to access these policies.